

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ROSE AMOUGOU NGASSAM	Case No: 07 Civ. 8172 (LLS)
Plaintiff,	
v.	NOTICE OF MOTION
MICHAEL CHERTOFF,	
Secretary of Department of Homeland	
Security; EMILIO GONZALEZ,	
Director of United States Citizenship &	
Immigration Services, F. GERARD	
HEINAUER, Director of the Nebraska	
Service Center of United States	
Citizenship & Immigration Services	
Defendants.	

PLEASE TAKE NOTICE that on the _____ day of October 2007, at _____ a.m. or as soon thereafter as counsel may be heard, attorneys for Plaintiff, shall move, before the Honorable Louis L. Stanton, U.S.D.J., United States Courthouse, Room 21C, 500 Pearl Street, New York, New York, 10007, for the entry of an Order in the form submitted herewith, granting to Plaintiff a Preliminary Injunction compelling and ordering the United States Citizenship and Immigration Services to comply with all federal regulations governing derivative asylum, and accordingly, to grant the three asylee-relative petitions which were wrongly denied by USCIS.

PLEASE TAKE FURTHER NOTICE that in support of this motion, Plaintiff shall rely upon this Notice of Motion, Memorandum of Law in Support of Plaintiff's Application for Order to Show Cause For Preliminary Injunction, the Affidavit of Rose Ngassam in Support of Order to

to Show Cause For Preliminary Injunction, the Affidavit of Rose Ngassam in Support of Order to Show Cause for Preliminary Injunction, the Affidavit of Sara Kahn, M.S.W., the Certification of Jenny-Brooke Condon in Support of Order to Show Cause for Preliminary Injunction, the Complaint and supporting exhibits submitted herewith.

PLEASE TAKE FURTHER NOTICE that counsel for Plaintiffs hereby requests oral argument.

Respectfully Submitted,



**SETON HALL UNIVERSITY SCHOOL OF LAW
CENTER FOR SOCIAL JUSTICE**

Attorney for Plaintiff
By: Bryan Lonegan Esq.
Jenny-Brooke Condon, Esq.
Gal Davidovitch (legal intern)
Jisun Chang (legal intern)